

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ANTHONY BAYAD,

Plaintiff,

v.

JOHN CHAMBERS, PATRICIA RUSSO,
ANTHONY SAVASTANO, and
CARL WIESE,

Defendants.

CIVIL ACTION

NO. 04-10468-GAO *MB*

DEFENDANTS' PROPOSED PRETRIAL SCHEDULE

Defendants John Chambers, Anthony Savastano, and Carl Wiese propose the following pretrial schedule:

- 1) Rule 26(a)(1) Disclosures must be completed by November 26, 2004.
- 2) Document Requests: First requests for production of documents must be served by December 13, 2004. Further requests may be served as required but no document request may be served later than 30 days prior to the close of written discovery as set forth below.
- 2) Interrogatories: Interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 33.1 of the Local Civil Rules of the District of Massachusetts must be served by December 13, 2004. No other interrogatories are permitted except by express permission of the Court.
- 3) All written discovery, with the exception of Requests to Admit, must be completed by March 18, 2005.
- 4) Depositions: Depositions may not be noticed or taken prior to the close of written discovery on March 18, 2005. All fact depositions must be completed by May 13, 2005.
- 5) Experts: Every proponent of a claim (including any counterclaim, cross-claim, or third-party claim) that intends to offer expert testimony in respect of such claim must make the disclosures required by Fed. R. Civ. P. 26(a)(2) by May 27, 2005. Every party-opponent of such claim that intends to offer expert testimony in opposition to such claim must make the

disclosures required by Fed. R. Civ. P. 26(a)(2) by June 20, 2005. All experts may be deposed but such depositions must occur prior to July 27, 2005.

6) Requests to Admit: All Requests to Admit must be served no later than June 27, 2005.

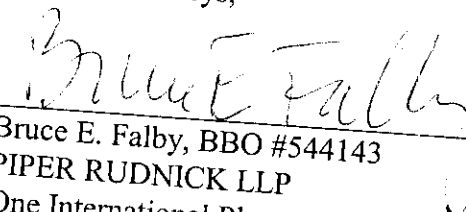
7) All discovery is to be completed by July 27, 2005. Interim deadlines set forth above may be extended on consent of all parties without application to the Court but in no event shall such extension result in an extension of this discovery completion deadline.

8) Dispositive motions must be filed on or before August 27, 2005.

Defendants' Local Rule 16.1D(3) Certifications are attached hereto.

Respectfully submitted,

DEFENDANTS JOHN CHAMBERS,
ANTHONY SAVASTANO and
CARL WIESE
By their attorneys,


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Dated: November 12, 2004